

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

FILED

JAN 26 2001

INDIANA UTILITY REGULATORY COMMISSION

In the Matter of the Petition of )  
Indiana Bell Telephone Company, )  
Incorporated d/b/a Ameritech Indiana )  
Pursuant to I.C. 8-1-2-61 For a Three )  
Phase Process For Commission )  
Review of Various Submissions of )  
Ameritech Indiana to Show Compliance )  
with Section 271(c) of The Telecommunications )  
Act of 1996 )

Cause No. 41657

**THIRD JOINT PROGRESS REPORT AND JOINT MOTION REGARDING  
RESOLVED OSS ENHANCEMENTS AND PROCESS IMPROVEMENTS**

**I. INTRODUCTION**

This Third Joint Progress Report and Joint Motion Regarding Resolved OSS Enhancements and Process Improvements ("Third Joint Progress Report and Joint Motion") supplements the initial Joint Progress Report, dated July 28, 2000, and a Second Joint Progress Report, dated October 23, 2000, both of which have been filed by the parties with the Commission in this proceeding.

As represented to the Commission in the prior Joint Progress Reports, the undersigned parties have engaged in numerous collaboratives both in Indiana and in other Ameritech states. As a result of those successful collaborative discussions, the following OSS enhancements and process improvement issues have been resolved for purposes of this proceeding, subject to successful implementation and testing. To the extent that disputes arise on these issues subsequent to this Third Joint Progress Report and Joint Motion, parties have agreed to use the

recommended Dispute Resolution Process as described in Section II, paragraph 7 of the initial Joint Progress Report.

This Third Joint Progress Report and Joint Motion has three purposes. First, this Third Joint Progress Report documents the resolution of certain issues that were identified by the parties as “Unresolved ‘A to AA’ Issues” as of November 27, 2000. As described in this Third Joint Progress Report, and subject to successful implementation and testing, the parties have reached agreement on of the following previously unresolved issues: Facility Modification Process, Issue A and F; Sub-loop Ordering, Issue D; “865” versioning, Issue F (2); Abbreviated Address Validation, Issue H; Hot Cuts, Issue G; Network Interface Devices, Issue O; Flow Through, Issue S; Directory Listing and Ordering , Issue L, Line splitting/Line sharing, Issue C; and Dark Fiber, Issue E. Finally, the parties have removed the issue of Ameritech’s change management process, a component of providing nondiscriminatory access to Ameritech’s OSS functions included in Issues J and K, as a disputed issue in this case.

The parties have not resolved all issues identified with certain product issues, including unbundled network element combinations, such as UNE-P and EELs, Issues B and V. As directed by the Commission’s Order entered on January 18, 2001, in Cause No. 40611-S1, the parties are evaluating which of the open unbundled network element issues in this case should be addressed in Cause No. 40611-S1.

Second, this Third Joint Progress Report documents newly resolved or supplements previously tentatively resolved issues and supplements the initial Joint Progress Report, dated July 28, 2000, and the Second Joint Progress Report, dated October 23, 200, As described in this Third Joint Progress Report, and subject to successful implementation and testing, the parties have reached agreement on of the following issues: LSOG 4 and Interim and Permanent GUI

Deployment, Issues I, R, J, K, T, U and those portions of Issues A, B, C, D, F and L that address LSOG 4 and GUI deployment; provision of xDSL and IDLC information, Issue A; E911 database management, Issue M; Notification of Change/TCNet, Issue P; LEC Protection, Issue Q; Account Management, Issue Y; and Branded Operator Services, Issue W.

Third, this Third Joint Progress Report identifies the few remaining issues that will benefit from further collaboration. These include finalizing the third party OSS Master Test Plan, a few issues regarding loop provisioning for hot cuts and xDSL loops, Issue G, and the impact of a recent court decision regarding certain advanced services. Based on the resolution of these issues as described in this Third Joint Progress Report and Joint Motion, and for the reasons described below, the undersigned parties respectfully request the Commission enter an Order in this proceeding consistent with the representations, recommendations and resolutions set forth in this Third Joint Progress Report and Joint Motion. In addition, the parties intend to continue to work with Commission Staff and KPMG to finalize the Indiana Master Test Plan and its Appendix F, entitled "Negotiated Modifications and Enhancements", to reflect the resolution of these issues. The parties agree, unless stated otherwise below, that the OSS, process and product resolutions described below will be within the scope of such third party testing.

## **II. OSS ENHANCEMENTS**

### **A. Local Service Ordering Guide, Version 4 (LSOG4) and related issues**

**Description of Issue:** Local Service Ordering Guide (LSOG) is a Telecommunications Industry Standard, advanced by the Alliance for Telecommunications Industry Solutions ("ATIS"), for computer systems dealing with local service pre-ordering, ordering and provisioning. The standard has been developed nationally. The current version of the standard is version 4, referred to as LSOG4. The parties agree that Ameritech should implement a compliant version of the industry guidelines known as LSOG4 as described

below, all of which will be tested by KPMG in it's OSS Evaluation Project as described in the Indiana Master Test Plan, hereinafter referred to as the "third-party OSS test."

1. LSOG is a telecommunications industry standard for computer systems dealing with local service pre-ordering, ordering and provisioning. The parties agree that the LSOG4 and GUI Deployment, interfaces, and OSS functionalities will be deployed and tested in the third party OSS test. The parties also agreed that to the extent these OSS functionalities were defined and resolved in the FCC collaborative proceedings under the SBC/Ameritech Uniform and Enhanced OSS Plan of Record, ( SBC/Ameritech Merger Order, CC Docket No. 98-141, ASD File No. 99-49) ("U&E POR"), those functionalities would be documented and implemented as defined in those proceedings for purposes of the Indiana OSS test. The nature and scope of Ameritech Indiana's commitment to deploy OSS application-to-application and graphical user interfaces and related OSS functions has been described in the parties' prior Joint Progress Reports, and those representations are incorporated by reference herein. (See Initial Joint Progress Report, Section III, paragraph 8; Second Joint Progress Report, Section B, paragraph 1; and Attachments 1-4.) Since those filings in this proceeding, the parties have made the following clarifications. First, Ameritech has clarified that the deployment of the OSS application-to-application and GUI interfaces will be as is provided for in the U&E POR. Second, and as discussed more fully below, these OSS enhancements include a single ordering interface integrating orders for directory listings and publishing with local service requests. Third, other OSS functionality that will be deployed and tested in Indiana include the relevant electronic interfaces (i.e., EDI and GUI) used to order UNE-P, including CLEC UNE-P to CLEC-UNE-P migrations and electronic loss notifications for such migrations. Finally, to the extent that "line splitting" is ordered by the Commission, including, but not limited to, Cause No. 40571-INT-03, the

AT&T arbitration, or the subdocket in Cause No. 40611, line splitting OSS functionality will be developed and implemented in accordance with such Orders, and may be the basis to determine whether or not “line splitting” is included within the scope of the Indiana third-party OSS test.

2. The parties previously agreed that the change management process to be applied to the deployment of the functions that are included within the March 2001 release is the Change Management Process (“CMP”) in the FCC Uniform and Enhanced Plan of Record (U&E POR), which is attached to the U&E POR as “Attachment A”, unless the parties agree otherwise. SBC/Ameritech agrees, subject to any required agreement of the parties to the FCC Uniform and Enhanced Plan of Record collaborative, that such U&E POR, which is Attachment 1 to this Joint Report, should be modified to provide that the December 12, 2000 13-State CMP be used for the March 2001 release, provided that the existing CMP schedules, as defined in Attachments 2, 3 and 4 to this Joint Report, remain in effect. SBC/Ameritech will work cooperatively with the U&E POR Drafting Team to recommend and implement this change.

Pursuant to Condition 32 of the *SBC/Ameritech Merger Order*, SBC engaged in a 13 state-wide collaborative to develop and deploy a uniform change management process. On November 1, 2000, Ameritech Indiana provided the Commission with a report on the status of those collaborations. The most recent version of the 13 State CMP was filed with the FCC on December 12, 2000, and is included here as Attachment 5. This 13-State CMP was agreed to by some, but not all parties to this proceeding. Although some parties have raised concerns with the OIS quorum requirements in the 13-State CMP either at the FCC or in other states, none of the

parties object to the adoption of that plan in Indiana. In the near future, Ameritech Indiana will file an update regarding the 13-State CMP with the Commission, at which time the parties and the Commission may take whatever action they deem appropriate. The 13-State CMP provides that: "State-by-State variances shall be implemented in accordance with whatever methods or procedures are ordered by the individual state public service commissions." (CMP, Section 2.2).

## **B. 865 Versioning, Sub-Loop Ordering and Address Validation**

**Description of Issue:** Ameritech had committed to deploying certain OSS enhancements prior to the March, 2001 LSOG 4 release. Notwithstanding, Ameritech did not meet those implementation dates for 865 Versioning, Sub-Loop Ordering and Abbreviated Address Validation. In addition, the CLECs believe that Ameritech should synchronize its Street Address Guide ("SAG") and Customer Service Record ("CSR") databases. Ameritech restates its commitment to deploy these OSS functions at the time and in the manner described below.

1. Ameritech will deploy "865" Versioning in the March 2001 release. The substance of the "865" versioning will be as described below. Full refresh of supplemental orders will be implemented in the March 2001 release. The manual processes of the agreement will be implemented by February 14, 2001 as described below. Ameritech's design commitment for Provider Initiated Transactions ("Unsolicited 865") is as follows:

In the interest of addressing CLEC concerns regarding the manner in which Ameritech provides 865 notices, and in the interest of improving processing of CLEC orders, Ameritech will implement Provider Initiated Transactions ("865") to notify CLECs of necessary changes that have been made to previously confirmed orders. In addition, Ameritech agrees to the following:

- (a) Ameritech will provide the Purchase Order Number (PON) and Version (VER) of the most currently processed LSR in its 865 transaction which will allow the CLEC to associate the 865 to the appropriate LSR in its system.
- (b) In the design and operation of the work center processes it employs to create the 865s, Ameritech will ensure that its representatives consider order supplements that may also relate to the confirmation being modified and accommodate changes made by those supplements in the 865 notice.
- (c) Ameritech work centers staff will endeavor to keep 865 transactions to the minimum level necessary to ensure the efficiency and effectiveness of the 865-notification process.
- (d) Ameritech will provide for coding the 865 transactions with a clear and unambiguous indicator(s) reflecting the underlying reason for the change in confirmation. The codes will assist Ameritech and CLECs in administering the performance measurements that relate to confirmations, jeopardies and the timeliness of the unsolicited 865s. E.g., codes assigned to jeopardy conditions for due date changes would be distinguishable from those for telephone number changes; codes for changes in service order numbers would be distinguishable from those for circuit number changes.
- (e) Ameritech will work collaboratively with the CLECs in the Phase III Category IV collaborative of the FCC Uniform and Enhanced OSS Plan of Record in developing the underlying reason coding scheme consistent with industry standards and CLEC needs for information about the underlying reasons for the transactions. Refinements and changes in reason codes and 865 processes that arise in the future would be proposed and implemented consistent with the Change Management Process.
- (f) On or before February 14, 2001, Ameritech will implement the activities and work described in paragraphs (b) and (c) above. Ameritech will use the time before February 14, 2001

to conduct necessary training and internal work necessary to undertake the activities and work described in paragraphs (b) and (c) above. Upon request, Ameritech will provide confirmation that the training described in this paragraph was completed on or before February 14, 2001, including a description of the timing, manner and substance of the training provided.

(g) All the Unsolicited 865 process improvements described in paragraphs (a)-(d) and (f) above will be made available in the March 2001 ordering release along with the implementation of the modifications to Ameritech systems to support full refresh supplemental orders by March, 2001 in the same manner as is utilized in the other SBC regions. Implementation of the reason codes as agreed upon as described in (e) above will take place with the implementation of Phase II of the uniform ordering interface as described in the FCC Uniform and Enhanced OSS POR (Attachments 1, 2, 3 and 4).

2 Ameritech included the capability for Sub-Loop Ordering within its application-to-application interface in the December 2000 release.

3 Ameritech will deploy Abbreviated address validation in the March 2001 release. WorldCom has received from Ameritech documentation explaining the present method by which Ameritech represents it only validates the full end user telephone number and the first group of characters (alpha or digits) up to the first occurrence of a "space" character of the street address field on UNE-P migration orders. WorldCom is in the process of validating that these edits do not cause additional rejects. In the event that these edits do cause additional rejects, then WorldCom reserves its rights to seek appropriate remedies related to Ameritech's lack of present deployment of Abbreviated address validation.

(a) Once abbreviated address validation is put into operation, Ameritech will examine the ways and means by which it can synchronize its CSR and SAG databases. It shall set out



a plan for the project, with detail, as per the recommendations of the Staff of the Illinois Commerce Commission (“ICC”) in the pending proceedings in Illinois Docket No. 00-0592, and Ameritech will provide a report to the Indiana Utility Regulatory Commission on May 1, 2001. Ameritech will implement the outcome of Illinois Docket No. 00-0592 in the same manner and time in Indiana as required in Illinois.

(b) Where CLEC orders are subject to a validation of street address, Ameritech’s SAG will be the only source used to perform that validation. Similarly on pre-ordering input transactions, where an address is required the CLEC should use a SAG-valid address. On a prospective basis Ameritech will fix discrepancies between the SAG and CSR as they are discovered in order processing.

(c) This resolution of the address validation issue in paragraphs (a) and (b) above is a compromise and settlement in this proceeding. It does not preclude any party from pursuing alternative resolution in other proceedings, however the fact of this settlement will not be used by any party in such proceedings.

### **C. Flow through**

**Description of the Issue:** “Flow-through” refers to any order that is electronically received from a CLEC and processed through Ameritech’s ordering interface into ACIS (the Ameritech service order system), without manual intervention. The parties agree to the following “flow-through” process improvements.

1. Ameritech will provide CLECs with a complete and accurate listing of the types of orders, per product/service, that flow through, with complete and accurate exceptions to any order type, product/service or ordering condition that prevents flow through, on or before April 15, 2001.

2. In April 2001, CLECs will provide Ameritech with a prioritized list identifying products/service order types that CLECs seek to have flowed through over the next 24 months. The prioritized list will reflect those products/services or order types that CLECs currently provide or anticipate providing in significant volumes. The CLEC list will include Centrex resale.

Also in April 2001, CLECs and Ameritech will assign a target percentage of flow through exceptions that will be eliminated quarterly over the next 24 months for each prioritized product/service order type or, for those product/service order types that do not currently flow through, determine which will be made to flow through. The twenty four-month period will be begin on the date the target percentage or the product/service order types to flow through are either agreed upon by the parties or determined by the Commission. If agreement on either such exception targets or product/service orders types cannot be achieved, CLECs may utilize the formal dispute resolution process agreed to by the parties in this case. That process is described in Paragraph 7 of the initial Joint Progress Report filed in this case on July 28, 2000.

3. Ameritech shall make a good-faith effort to attain significant improvements over the next 24 months in the flow through rate for the order and product/service types identified in the CLEC list provided under paragraph 2. In May of 2001, Ameritech will set a percentage target for each order and product/service type that it believes represents a significant improvement for those order and product/service types. Ameritech will publicly file that target in a report, which it will serve upon all parties of record.

4. By May 2001, Ameritech will provide a detailed project plan outlining the milestones it will report, on a quarterly basis, to reflect progress in improving flow through. Ameritech will disaggregate its flow through performance measure in order to allow parties to

view (on a monthly basis) the flow through percentage for each of the product/service and order types identified in paragraphs 2 and 3 above.

5. The project plan, along with the CLECs' prioritized list, will be presented to the Commission for monitoring.

6. Quarterly, beginning on September 10, 2001, Ameritech will file reports detailing about how its flow through improvement efforts are progressing. These reports shall be filed with the Commission and served on all parties in this proceeding. Ameritech's quarterly reports will be subject to Commission review. CLECs will have the opportunity to comment on the quarterly reports. These quarterly reports are not intended to replace whatever monthly performance measurement reports Ameritech provides to CLECs.

7. If CLECs believe that significant progress has not been made, they may petition the Commission to request a determination and to request penalties and other specific remedies, which may include payments to CLECs.

#### **D. Interim GUI**

**Description of the Issue:** Ameritech represented that it could not deploy its permanent graphical user interface on October 1, 2000. As a result, Ameritech has provided an interim GUI option until it deploys its permanent GUI.

1. Ameritech agreed to provide a graphical user interface (GUI) on an interim basis for CLEC use in ordering unbundled loops, with and without number portability, CPO/UNE Platform as offered by Ameritech or as ordered by the FCC or the Commission, and resale until a permanent GUI is implemented. (See Initial Joint Progress Report, Section III, paragraph 9.)

2        Attachment 6 contains the terms and conditions by which the interim GUI will be provided as agreed to by the parties. CLEC training sessions for using the Interim GUI began in September 2000. The interim GUI will be available until the permanent GUI is successfully deployed, defined as in production and functional, currently scheduled for March 2001. The parties agreed that since the permanent GUI will be tested in the third-party OSS test, the interim GUI will not.

#### **E. Directory Listing and Ordering**

**Description of Issue:** Depending on the type of order, a CLEC must place its directory listing orders through either an interface with Ameritech, or a separate interface with Ameritech Advertising Services. Similarly, once a CLEC has retained a customer with a listing, in order to access that customer's listings (via a directory listing pre-ordering inquiry), the CLEC must currently access those listings through Ameritech Advertising. In March 2001, Ameritech will allow CLECs to acquire listing information for its UNE-P and resale customers through the Ameritech application-to-application EDI interface and GUI. CLECs believe that Ameritech must design its directory listing inquiry and ordering system to function over a single Ameritech interface. Ameritech has made this commitment as described below. Ameritech has also agreed to allow CLECs to submit "retain as is" directory orders for full account migrations, for which directory listings do not change.

The following is a brief description of Ameritech's commitments in regard to directory listings:

1.        Ameritech will incorporate the functionalities of its OSS interface and Ameritech Advertising Services Electronic Data Interchange (EDI) interface so that CLECs can use a single Ameritech interface for service orders for directory listing on or before June 2001. The parties agree that this interface is within the scope of the Indiana third party test.

2.        Ameritech will develop a listing inquiry for all directory listings in Ameritech regional white page directories databases that are maintained by Ameritech Advertising Services (AAS), subject to the following conditions. By September 2001 AAS' existing GUI interface

listing inquiry will be modified to allow CLEC access to the listings of other CLECs' end user customers (served by all product/service order types) subject to AAS' legal restrictions or contractual obligations with other CLECs. In addition, this directory listing inquiry function will be added to Ameritech's single preordering application-to-application and GUI interfaces by June 2002. Such enhancements will allow CLECs access to such listings of other carriers to the extent and in a manner consistent with Ameritech's legal restrictions and contractual obligations. Ameritech will work cooperatively with CLECs to enable such sharing of directory listings between CLECs, including but not limited to the development of a proposed model contract amendment to existing CLEC-AAS contracts. Parties to this Joint Report will not pursue an earlier or expanded resolution to this issue for Ameritech in either the FCC Uniform and Enhanced OSS proceeding or other Ameritech state proceedings.

The parties agree that the deployment of the June 2002 functionality described in this paragraph will not be part of the third party test nor considered an entrance or exit criteria, of the third party OSS test or the Master Test Plan (MTP), as ordered in this proceeding; provided however, if such third party testing is still in progress at the time Ameritech deploys the interfaces described in this paragraph (scheduled for June 2002), such interfaces shall be considered as part of such test. The parties have not reached agreement on whether the directory functionality described in this paragraph (except as provided in the preceding sentence and in paragraph 1 above) will be within the scope of the third party OSS test. The parties expressly reserve their rights to recommend in the continuing Indiana MTP collaborative discussions that KPMG modify the current MTP to incorporate for testing purposes some or all of these OSS functions.

3. Effective June 1, 2001, AAS will offer CLECs the option of receiving two pre-Business Office Close (BOC) reviews. The first pre-BOC will be provided 45 calendar days in advance of the directory close date. The second pre-BOC, if requested, will be provided 15 calendar days in advance of directory close. A CLEC will be required to request the second pre-BOC 30 calendar days before the directory close date. There will be a \$200 charge for a second pre-BOC. In order for corrections from the first pre-BOC to be entered on the second pre-BOC, a CLEC must provide those corrections at least 4 business days before the delivery of the second pre-BOC. This voluntary option of receiving two pre-BOC reviews will not be part of the third party test.

If at least 95% of the corrections requested after the first pre-BOC are not corrected in the second pre-BOC, the \$200 charge for the second pre-BOC will be waived. If at least 99% of the corrections requested from the first and re-requested from the second pre-BOC are not corrected in the final published directory, the remedy will be as described in the business rule in performance measure CLEC-W4. The remedy may include a requirement that AAS indemnify the CLEC against any claims by customers whose directory listings are not corrected as required by this policy.

The proposed performance measure CLEC-W3 will be considered in the six-month review process. Performance Measure CLEC-W4 shall apply to this policy.

#### **F. Master Test Plan**

**Description of the Issue:** A number of CLECs requested that the Indiana Master Test Plan be expanded to provide additional review of certain manual processes. The following will be added to the MTP.

1. KPMG will supplement the Master Test Plan (MTP) to provide for manual processes, such as loop ordering and provisioning, a work force review or force and load analysis, that would identify work force additions necessary to accomplish manual ordering and provisioning requirements at certain increased future order volume levels of 150% and 200% of (forecasted) normal volumes, to be determined consistent with the approach adopted in the MTP for determining (forecasted) normal volumes, for such manual processes.

2. KPMG will supplement the MTP to provide for the submittal of an independent reasonableness opinion by KPMG or another third party of the force and load outputs and conclusions for the workforce review of manual processes. The opinion will be provided in KPMG's report to the Commission based on the third party OSS test. The parties understand that the volume and stress tests in the MTP are designed to include only pre-order transactions and flow-through eligible orders. To the extent such orders do not flow through, the MTP will include an accounting and a report on the outcome and performance for both the electronic and manual portions of the orders processed during the test.

#### **G. Advanced Services**

1. The parties have recently become aware of the decision in Association of Communications Enterprises v. Federal Communications Commission, No. 99-1441, 2001 U.S. App. LEXIS 217 (D.C. Circuit January 9, 2001) (the "DC Circuit Decision"). The DC Circuit Decision may obligate Ameritech Indiana and/or its affiliates to provide its advanced services wholesale offerings, including services and unbundled elements (e.g., resale and unbundling), pursuant to Section 251(c) of the 1996 Act. SBC has stated publicly that, as a result of this

Decision, it will be looking at the option of providing its advanced services wholesale offerings through the SBC/Ameritech incumbent LEC.

2. The parties have not reached agreement on whether any such advanced services wholesale offerings may be within the scope of the Indiana third-party OSS test. The parties reserve their rights to request additional OSS enhancements, appropriate amendments to the Master Test Plan, and additional and/or appropriate amendments to existing Performance Measurements in light of the DC Circuit Decision when it becomes effective. Appropriate amendments to the Master Test Plan include, but are not limited to, the addition of transaction scenarios intended to capture the advanced services wholesale offerings that may be offered by Ameritech Indiana and/or its affiliates. The term "affiliate" shall have the same meaning as in 47 U.S.C. Section 153(1).

3. Ameritech will notify the Commission and the parties to this case via the email address established for this case within two business days from the date this DC Circuit Decision becomes effective. A collaborative to discuss the impact of the DC Circuit Decision on this case, including the matters identified in Paragraph 2 above, will begin within two weeks from the date this DC Circuit Decision becomes effective. Parties shall provide an initial status report to the Commission within one week of that meeting. The parties acknowledge that CLECs requested to begin these collaborative discussions immediately. Ameritech declined to begin those discussions at this time. If CLECs seek to expand the scope of the Indiana third party test to include these advanced services wholesale offerings on or before May 1, 2001, Ameritech will not oppose such request based on the grounds that such request is not timely or would delay the completion of the Indiana third party test. Notwithstanding, Ameritech reserves its right to object to such request on other grounds, such as relevancy or commercial volumes. At any time,



the parties may file petitions regarding unresolved issues regarding these advances services wholesale offering issues pursuant to the dispute resolution procedure agreed to by the parties in this case. That process is described in Paragraph 7 of the initial Joint Progress Report filed in this case on July 28, 2000.

### **III. PROCESS IMPROVEMENTS**

#### **A. Facilities Modification Process**

**Description of the Issue:** Ameritech's methods of ordering and provisioning unbundled loops to CLECs had sometimes failed to identify facility problems that could delay order completion early in the process. As a result, loop assignments would be made, but problems would not be detected until on or near the due date. Ameritech agreed to revise its facility modification policy. The most recent version of Ameritech's facilities modification policy, as documented in Accessible Letter CLEC AM-00-153, dated October 27, 2000, which is included as Attachment 7, and as clarified below, resolves this issue.

1. The facilities modification policy will require a delay notice, Form A, within 24 hours of receiving the original firm order confirmation (FOC) on or before April 1, 2001. Prior to that time Ameritech Indiana will use all reasonable efforts to provide such 24-hour notice prior to April 1, 2001. Ameritech will provide to the Staff and the parties a written report describing such efforts on a monthly basis.

2. Any charges that Ameritech Indiana seeks to collect for work performed pursuant to the Facility Modification Policy will be consistent with Indiana law.

3. (a) Ameritech will provide to the Commission and all requesting parties to this Joint Motion monthly reports relating to all integrated digital loop carrier (IDLC) and remote switching unit (RSU) construction-related activities and all other orders that are subject to a 30

day quote interval under its Facility Modification Policy, except for Orders related to loop conditioning. At a minimum, this report must include for each order the following:

1. Date of the Ameritech notice of delay in provisioning the order.
2. Date of the Ameritech notice or form identifying the general nature of the work activities associated with the order.
3. Date of the Ameritech notice or form for an IDLC-related order, identifying the general nature of the work activities associated with the order.
4. Detailed description of all work activities required to complete the order, including, upon request, reports or work descriptions generated by the engineering staff assigned to the order.
5. Revised due date communicated in the notice filed under 2 or 3 above.
6. Actual completion date or pending status of the order.

(b) Ameritech will perform a quarterly review of the reports filed under (a) above for the purpose of (1) determining whether Ameritech's current 30 day interval policy for providing an IDLC quote is appropriate and the extent to which the policy should be revised; and (2) clarifying the circumstances or activities that qualify as IDLC-related construction activities. These reviews shall be conducted jointly with Commission staff and parties to this Joint Report, subject to any confidentiality concerns. Within 30 days after completion of each review, Ameritech will submit a written report on the review to the Commission and the requesting parties to this Third Joint Progress Report and Joint Motion. This report must, at a minimum, provide clarification of Ameritech's definition of IDLC-related construction activities and a rationale for Ameritech's interval policy of a 30-day quote interval for IDLC orders.

(c) Report information must be provided for Ameritech Indiana and, in aggregate, for the remaining Ameritech states.

4. Pursuant to the 13 State Change Management Guidelines and the CLEC User Forum Guidelines, Ameritech will propose the following change in the facility modification policy to the CLEC User Forum in December 2000:

- If the Good News Notice, Form D, is provided by Ameritech prior to the due date, the CLEC may:
  - (a) Retain the confirmed due date and Ameritech will work the order as scheduled, or
  - (b) Submit a supplemental order and Ameritech will provide a revised due date subject to the standard due date intervals from the supplemental order.

5. Ameritech will implement six performance measures for the Facilities Modification process. Additional performance measures for this process will be considered in the six-month review process upon CLEC request. The agreed performance measures are identified as follows: CLEC-W1, CLEC-W6, CLEC-W7, CLEC-W8, CLEC-W9, and CLEC-W11. The parties will file a Supplemental Joint Motion with the Commission in this Case requesting the Commission to approve these measures.

**B. Availability by central office of percentage of loops where constraints in provisioning of xDSL exist.**

**Description of the Issue:** In addition to loop makeup information, CLECs requested a procedure for requesting and receiving by central office DLC loop percentages. Ameritech responded to this request as described below.

1. Effective September 1, 2000, Ameritech has implemented a simple procedure for requesting and receiving Digital Loop Carrier (DLC) loop percentages by central office. In further collaborative discussions, parties agreed that simply providing an overall percentage of loops served by DLC for each central office did not provide meaningful information about potential facility issues for orders of unbundled loops. This is because there are multiple distribution areas and routes served out of a central office. From a mathematical standpoint, the overall percentage of DLC loops would only be meaningful if the CLEC expects to request loops in a random fashion equally throughout the entire wire center. Even if used for a marketing planning tool, the information could be misleading since the information is not available by distribution area. Notwithstanding this limitation, as requested, Ameritech will provide this "central office" level information upon request within 10 business days and will provide a form for CLECs to use to make such requests.

2 As an alternative, which CLECs agreed would provide more useful information, Ameritech will also provide access to its new DSL Tracking Inquiry Tool (DTI) and Distribution Area (DA) information from its internal network systems. The combination of these two tools provide the CLECs with the ability to identify, within a smaller geographic area in a wire center, where loops are served by integrated loop carrier or universal loop carrier. This information is more specific than an overall percentage of loops served by DLC in a central office.

3. The parties have not reached agreement on whether the information or tools described in this Section III B. will be within the scope of the third party OSS test. The parties expressly reserve their rights to recommend in the existing Indiana MTP collaborative discussions that KPMG modify the current MTP to incorporate for testing purposes some or all of this information or tools.

### C. Hot Cuts

**Description of the Issue:** When a CLEC is using an unbundled loop to serve a customer, this means that the wire pair (loop) serving the customer must be physically connected to the CLEC's collocation and to the CLEC's switched network. Converting that customer from Ameritech service to the CLEC's service requires, based on the technology presently deployed in Ameritech's existing circuit switched network, that an Ameritech technician physically disconnect the loop from the connection to Ameritech's switch and physically connect it to a connection leading to the CLECs' collocated equipment (and on to its switched network).

In addition, such live customer conversions require that all calls intended for that customer must be now delivered to the CLEC's switch instead of to Ameritech's switch. This involves updating systems and various databases.

The hot cut process is designed to ensure that these events happen in the proper sequence (e.g., that calls for the customer are not sent to the CLECs switch before the customer is connected, nor that the calls are sent to Ameritech's switch after the customer has left). The hot cut process also describes how potential problems are handled to ensure a smooth transition. Finally, the hot cut process deals with testing of the elements, and the "throwback" process, in which the CLEC can request that a customer can be reconnected to Ameritech service if the conversion to the CLEC service does not work and cannot be fixed without having the customer out of service for a prolonged period. Ameritech's new hot cut process is included here as Attachment 8.

1. Ameritech will conduct a dial tone/ANI test on the day of cut, as a matter of course. In addition, for those CLECs who desire, Ameritech will also conduct a dial tone/ANI test two days before due date (DD-2). CLECs who desire dialtone/ANI testing on DD-2 as a matter of course need only provide Ameritech a single notice of such desire. Once Ameritech receives such notice from a particular CLEC, it will conduct DD-2 dialtone/ANI testing for all cutovers requested by that CLEC as a matter of course at no additional charge. Ameritech will enter into further collaboration with the CLECs to define the new routine process.

2. Ameritech will not charge CLECs for dial tone/ANI testing if done on a routine basis on DD-2 and /or on the date of cut. In addition, Ameritech will provide a dial tone/ANI test on a separate date as requested by the CLEC, subject to applicable charges.

3. Subject to the outcome of the Wisconsin collaborative, Ameritech will provide to the CLECs notice of a failed dial tone/ANI test conducted on DD-2 no later than 4 business hours after such test or by 10 am on DD-1, whichever occurs first. In addition, Ameritech will discuss potential procedures in the event a failure is found during such dial tone/ANI test performed on DD-2. However, in any event if a dial tone/ANI test is conducted on DD-2 Ameritech will perform another dial tone/ANI test as a matter of course on the date of cutover. These collaborative discussions are expected to conclude by the end of February 2001. The parties will report on the status of those collaborative discussion to the Commission on or before March 9, 2001.

3.

4. Ameritech will provide CLECs with status updates every two hours until the order is completed for all hot cuts that fail at the time of the originally scheduled cutover. In the case where trouble is reported after order completion, status will be available via Electronic Bonded Trouble Administration (EBTA) on a real-time basis.

5. Ameritech will implement "flags" for desired frame due times for Coordinated Hot Cuts (CHC) consistent with industry guidelines, if and when such flags are included in such guidelines upon a request from a CLEC and consistent with its then current Change Management Policy (CMP).

6. Ameritech will test and implement a "non-coordinated" frame due time hot cut process. Ameritech will continue to collaborate to define methods and procedures necessary for such process. Such collaborative discussions will begin in early January and will be concluded by February 28, 2001. At the conclusion of such collaborative discussions, but no later than March 9, 2001, the parties will file a joint report advising the Commission of all resolved "non-

coordinated” frame due time cutover issues. The parties further agree that unresolved “non-coordinated” frame due time cutover issues should be raised on March 9, 2001 through petitions filed in this case. The petition should include a summary of the issue and the parties’ position. The process for these petitions shall be as described in Paragraph 7 of the initial Joint Progress Report filed in this case on July 28, 2000.

7. CLECs have raised specific issues relating to the unbundled stand-alone loop provisioning process as that process relates to xDSL cutovers. In particular, CLECs in Indiana have requested that a process be developed to provide CLECs access to the circuit number for xDSL loops they intend to order during the pre-ordering process, even if such loops are currently being used by another carrier. In addition, CLECs have requested that a process be developed to conduct a “proof of continuity” test for xDSL loops on Due Date-2. Ameritech is willing to discuss these issues that have just been raised in these proceedings to determine whether such requests are appropriate or not. Such collaborative discussions will begin in January 2001 and will conclude by February 28, 2001. At the conclusion of such collaborative discussions, but no later than March 9, 2001, the parties will file a joint report advising the Commission of all resolved xDSL cutover issues. The parties further agree that unresolved xDSL cutover issues should be raised on March 9, 2001 through petitions filed in this case. The petition should include a summary of the issue and the parties’ position. The process for these petitions shall be as described in Paragraph 87 of the initial Joint Progress Report filed in this case on July 28, 2000.

#### **D. Network Interface Devices**

**Description of the Issue:** The Network Interface Device (NID) is a device that connects the customer’s inside wiring to the telephone company provided outside plant. As a result of

discussions with the CLECs, Ameritech has clarified its procedures for moving internal NIDs outdoors as described below.

1. Ameritech will move an internal “protector” or “station block” (which are defined as a grandfathered demarcation point that contains a non-jacked end (RJ11 or RJ21) type device) to an external location with a RJ-type device at no charge to the CLEC. Ameritech will perform such work, if it makes a customer premise visit for any reason, unless the customer specifically requests that the protector or station block not be moved. The protector or station block will be replaced with a RJ-jacked type device on an external location and Ameritech will reconnect the new device to the customer’s existing inside wire, except if the end user specifically directs the location to be internal. This work will be performed at no charge. Ameritech will move a working internal NID to an external location at Ameritech's existing time and material charges on a nondiscriminatory basis for retail and wholesale customers if the CLEC places an order for such work. This process will be described in an Accessible Letter that will be issued in the near future Ameritech will waive such charges for CLEC-requested NID moves for a period of six months from the date this Joint Motion is filed in this proceeding.

2. Performance measure CLEC-W5 shall apply to this process. The parties will file a Supplemental Joint Motion in this Case requesting the Commission to approve this measurement. In addition a CLEC may request an audit of Ameritech’s records to determine if protectors were not moved during previous technician visits. Such an audit by a CLEC may not be requested more frequently than every six months. A CLEC which requests such an audit will provide a list of orders where the CLEC required Ameritech to move a protector and Ameritech will audit its records to determine, if in any of those cases, a technician made a premises visit after the effective date of the Order in this proceeding. The results of this audit will be compared



to the benchmark of Performance Measure CLEC-W5 and Ameritech will make an adjustment to the remedies paid in the previous six months to include the additional number of occurrences identified in the audit. This measure will be effective on or before the effective date of the Order in this proceeding.

**E. E911 Database Management (confirm parity between Ameritech and CLECs)**

**Description of the Issue:** The E9-1-1 system uses a database separate from the CSR and SAG. This database is maintained by the municipalities and does not use postal standards, therefore addresses which pass Ameritech's SAG may not pass validation for the E9-1-1 database. This problem also affects Ameritech and no simple solution seems available. Ameritech and the CLECs have agreed to address this problem as described below.

1. Ameritech stated that the database used for E911, called the Master Street Address Guide (MSAG), is built, and maintained by the Public Service Answering Point (PSAP) in each applicable county. Although Ameritech administers the MSAG database, any updates are subject to PSAP authorization. In contrast, the Street Address Guide (SAG), which Ameritech uses to validate end user addresses when service orders are submitted, is built and maintained by Ameritech.

2. Conflicts exist between the two databases (SAG and MSAG) because a customer's mailing address for postal service delivery purposes as needed for the SAG may list one community, but the customer's physical location, as needed for the MSAG for purposes of emergency service dispatch by the PSAP, may list another community, among other reasons. Therefore, when CLECs attempt to validate a customer address for submitting a service order to Ameritech, the order may pass the SAG edit check but be rejected by the MSAG E911 database edit check. No effort has been made to synchronize these two databases because the addresses

may always need to be different. As a result, CLEC service orders may be delayed because of the need for the CLEC to resubmit the orders to satisfy the MSAG E911 database edit.

3. During the collaborative discussions, it was clear that Ameritech and CLECs have the same problem with respect to address validation between the SAG and MSAG. This issue could be resolved if only one database could be used to determine a valid address for both service order and E911 purposes but such objective is beyond the scope of this proceeding. In lieu of a single database for address verification, Ameritech has agreed to notify CLECs through the CLEC User Forum of any new processes or updates to the E911 database.

4. The parties agree that the information described in this Section III E. will not be within the scope of the third party OSS test.

#### **F. TC/Net Change Policy**

**Description of the Issue:** TC/Net, Ameritech's prior web site, has been replaced with CLEC Online. These web sites provide CLECs with information about services, policies and procedures regarding their interactions with Ameritech. The CLECs raised some issues about how they would be notified about changes to the website, and how historic information on the dates and extent of past changes would be retained. Ameritech has made some changes to its procedures in response, and these changes are described below.

1. "Accessible Letters" are used by Ameritech to inform CLECs of changes regarding OSS and EDI and GUI related issues only. Ameritech places this information on a web page called TC/Net for access by all CLECs. On the other hand, SBC uses Accessible Letters to inform CLECs about all changes that affect CLECs (not just OSS and EDI) including tariffs, products and services, and methods and procedures. On September 30, 2000, Ameritech began implementing SBC's policy on Accessible Letters and is migrating its TC/Net information to SBC's company-wide website for CLECs. Ameritech also agreed to provide "before and

after” images of Accessible Letters as well as a Change Log reflecting changes posted on the web page so that CLECs can follow and track the changes that have been made.

2. Ameritech and the CLECs have also reached agreement on a Change Management process for non-OSS issues. The parties have agreed that Ameritech will communicate changes to its processes, procedures and manual forms to CLECs via Accessible Letter and will follow the change process outlined in the CLEC Users Forum. The CLEC Users Forum allows CLECs and Ameritech to identify, submit, discuss and resolve issues that impact Ameritech and CLECs in daily business practices. Examples of issues addressed in the CLEC Users Forum include network operations, business practices, maintenance and repair, and billing. The parties intend for the Change Management process to be dynamic in nature, and to be managed through regular meetings of the CLEC Users Forum. Parties agreed to review the effectiveness of this process every six months. There are three categories of changes that will be addressed using the CMP:

**Category 1: Changes Impacting CLEC Methods and Procedures**

For these issues, Ameritech will provide notification via an Accessible Letter and include the planned implementation date, the type of change, exceptions to certain standards for manual orders, description of the change, and any other relevant information. Category 1 changes will be implemented no less than 30 calendar days from the date of the initial notification. During this period, CLECs will have an opportunity to seek clarification, ask questions, and provide comments regarding Category 1 issues.

### **Category 2: Informational Changes**

Category 2 changes are informational in nature and would not require extensive modifications on the part of the CLEC. Ameritech will notify CLECs in the same manner as Category 1 changes and include the same types of information. Implementation will be no less than 15 calendar days from the date of the notification during which the CLECs will have an opportunity to provide comments.

### **Category 3: Exception Changes:**

Category 3 changes involve changing the timeframes for Category 1 or 2 changes. Any request for an exception will be forwarded to a CLEC Users Forum Committee for consideration.

3. The process improvements described above will be within the scope of the third party OSS test. The parties recommend that KPMG modify the current MTP to incorporate for testing purposes the process improvements discussed above.

## **G. LEC Protection**

**Description of the Issue:** LEC Protection is a service that Ameritech has considered offering to its retail customers under which Ameritech would not change that customer's local service to another CLEC unless the CLEC presents a verified letter of authorization (LOA) from that customer.

1. Ameritech has committed that LEC Protection would not be implemented in Indiana prior to April 2001. However, Ameritech stated that if and when it proposes to deploy LEC Protection after April 2001, the applicable Change Management process would apply, either the 13-State CMP, which requires 120-day advanced notice if an interface is affected ; or the CMP for non-OSS changes, "Category 1," which requires 30-day advanced notice if an interface is not affected. To the extent that Ameritech proposes to deploy this service after April

2001, Ameritech agreed to provide CLECs with notice and the opportunity to invoke the Dispute Resolution Process as provided in the Initial Joint Progress Report. Further, if LEC Protection is ever implemented in Indiana, parties agree to develop a process by which the LEC Protect could be removed from a CLEC order.

## **H. Account Management**

**Description of the Issue:** The Account Management team is a group of Ameritech employees assigned to a particular CLEC as its main point of contact and resource. CLECs had a number of complaints about the functioning of the account management teams and the methods for escalating problems to higher levels. Ameritech revised its account management teams and functions as described below.

1. Ameritech presented a revised Account Manager Handbook that details the account management responsibilities and operating guidelines for conducting business with CLECs. In response to this draft, CLECs recommended numerous changes including:
  - a. Providing a broader definition of account team functions.
  - b. Adding organization charts, job descriptions and other information regarding organizations that support the account team.
  - c. Providing a specific definition that the account team is the internal advocate for CLEC issues within Ameritech.
  - d. Strengthening the role of account management by expanding the authority of account team members to resolve CLEC issues.
  - e. Reducing time frames for responding to critical CLEC communications including telephone calls, pages and emails.
2. Ameritech agreed to these revisions. A Revised Version of the Handbook is included as Attachment 9.

#### **IV. PRODUCT ISSUES**

##### **A. Line Sharing/Line Splitting**

**Description of the Issue:** Line sharing is the use of the high frequency portion of the loop by a CLEC to provide high speed data, when Ameritech continues to provide voice service over the same loop using the low frequency portion of the loop. Line splitting is the use of both the high and low frequency portions of the loop by a CLEC (or by two CLECs), without any use by Ameritech. A line splitter is equipment used in either situation to split the loop into high and low frequencies.

1. In response to the FCC's Line Sharing Order, Ameritech began offering line sharing to CLECs through a contract amendment in May 2000. This amendment contains the rates, terms and conditions whereby CLECs may use the high frequency portion of Ameritech's UNE-Loops for digital subscriber line (xDSL) services. According to Ameritech, some CLECs have signed this amendment while others have chosen to arbitrate under Sec. 252 of the federal Telecommunications Act of 1996. In addition, pursuant to the Commission's Order in Cause No. 40611, a subdocket will be initiated to address the cost issues associated with these products. To the extent any decision in the subdocket in Cause No. 40611 changes these product offerings, the MTP will be modified accordingly.

2. CLECs also requested that Ameritech implement a Graphical User Interface (GUI) to order line sharing and line splitting services. As discussed above, the Interim GUI agreed to by the parties does not currently support ordering for line sharing or line splitting. However, to the extent this ordering functionality becomes available at a later date in another state, it will be made available to CLECs in Indiana, and only to the extent the Commission orders Ameritech Indiana to provide line splitting.

3. The issue of whether Ameritech will be required to provide line splitters for both line splitting and line sharing has been addressed by the Commission in Cause No. 40571-INT-03, the AT&T arbitration and may be addressed in the subdocket in Cause No. 40611.

## **B. Dark Fiber**

**Description of the Issue:** Sending voice or data over a fiber optic cable requires both the fiber and the lasers and electronics on the ends of the cable. Fiber optic cable without electronics or lasers is called dark fiber. Since the electronics are changeable, CLECs occasionally seek to lease dark fiber, and provide their own electronics and lasers. Dark Fiber is required to be provided as an unbundled network element.

1. Dark Fiber will be addressed in the subdocket in Cause No. 40611.
2. Ameritech will modify its existing or future offering regarding the recapture of dark fiber to read as follows:

(a) Ameritech may reclaim dark fiber from a CLEC upon at least 12 months written notice to the CLEC only if:

- (1) Ameritech negotiates with the CLEC in good faith to address the CLEC's concerns related to Ameritech's proposed reclamation, including issues related to coordination and timing for the purpose of minimizing service disruption;
- (2) Ameritech demonstrates to the satisfaction of the CLEC or the Commission that Ameritech reasonably needs the dark fiber to meet its carrier-of-last-resort responsibilities within 12 months following the reclamation; and
- (3) Ameritech offers to provide the CLEC with an alternative facility with the same bandwidth the CLEC was using or had committed to use prior to Ameritech reclaiming the facility, provided the alternative facility does not result in any additional costs or charges to the CLEC or reduce the

quality of the CLEC's services.

(b) Ameritech and any interested CLEC may negotiate any alternative contractual terms and conditions for reclamation of dark fiber subject to mutual agreement or to arbitration of such terms.

The product improvements described above will be within the scope of the third party OSS test. The parties recommend that KPMG modify the current MTP to incorporate for testing purposes the process improvements discussed above.

### **C. Branded Operator Services**

**Description of the Issue:** Ameritech offers operator services to CLECs that do not provide their own operators. CLECs requested to have calls to that service identified with a prerecorded introduction (e.g., "Thank you for calling CLEC"). The following describes Ameritech's response to these requests.

1. Ameritech implemented a new capability for branding Operator Services (OS) and Directory Assistance (DA) based on a CLEC's Service Provider Identification (SPID, also known as the operating company number.) The SPID allows CLECs using Ameritech's OS/DA products in the UNE ULS and Resale environment to brand OS/DA with its own company brand. The CLECs branding phrase recording will be played to the originating end user at the beginning of the call prior to the call being connected to Ameritech's OS/DA systems. CLECs are satisfied with functionality of SPID if it functions as described above.

2. The CLECs and Ameritech are still discussing several details of the SPID solution including: i.) whether this offering will be provided pursuant to contract or tariff, or both; ii.) whether pricing is market based or cost based, and in either case, the total price to the CLEC; iii.)



whether, or how, the prices, terms, or conditions of the SPID solution can be changed and by whom; and iv.) whether the SPID solution works for the UNE-Platform.

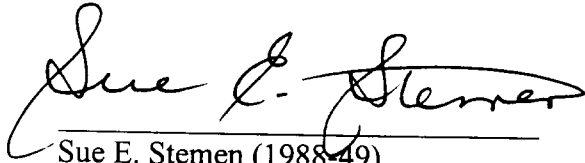
## **VII. CONCLUSION**

The undersigned parties have engaged in numerous collaborative hearings with Ameritech in Indiana and in other Ameritech states. Based on those discussions, the parties believe that the resolution of these issues as set forth in this Third Progress Report and Joint Motion is in the public interest for at least the following reasons:

- The resolution will permit the implementation of OSS solutions that, once properly implemented, will permit Ameritech to provide products and services to CLECs more efficiently and will permit CLECs to obtain products and services from Ameritech more efficiently than if these issues were not agreed to, with the ultimate objective of facilitating the development of competition in Indiana.
- The resolution addresses highly complex, technical OSS issues in a collaborative manner that is efficient and fair to the interests of all parties and consistent with the public interest.
- The resolution will reduce the number of issues that require resolution by the Commission, thereby permitting the Commission to focus its resources on deciding those issues that remain outstanding.

WHEREFORE, the undersigned parties respectfully request that the Commission enter an Order in this proceeding consistent with the resolution of specified OSS enhancements and process improvement as set forth above in this Third Joint Progress Report and Joint Motion.

Respectfully submitted,

A handwritten signature in cursive script, reading "Sue E. Stemen". The signature is written in black ink and is positioned above a horizontal line.

Sue E. Stemen (1988-49)

AMERITECH INDIANA

240 N. Meridian Street, Room 1831

Indianapolis, Indiana 46204

Telephone: (317) 265-3676

Facsimile: (317) 265-3343

Attorney for Indiana Bell Telephone Company,  
Incorporated d/b/a Ameritech Indiana

\*\* Signature Authorization not received at time of filing  
AT&T Communications of Indiana, Inc.

Rod Cox by SS  
McLeodUSA Telecommunications Services, Inc.

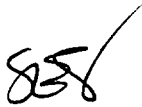
\*\* Signature Authorization not received at time of filing  
The Office of Utility Consumer Counselor

\*\* Signature Authorization not received at time of filing  
Rhythms Links, Inc.

Nikki Shultz by   
Time Warner Telecom

\*\* Signature Authorization not received at time of filing  
Worldcom,



Claudia Earls by   
Z-TEL Communications, Inc.

\*\* Signature Authorization not received at time of filing  
Sprint Communications Company L.P.,  
and United Telephone Company of  
Indiana, Inc., d/b/a Sprint

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon the following this 26<sup>th</sup> day of January, 2001.

Karol Krohn  
Office of Utility Consumer Counselor  
Indiana Government Center North  
100 North Senate, Room N501  
Indianapolis, Indiana 46204

Douglas W. Trabaris  
Senior Attorney  
AT&T Corp.  
222 West Adams Street; 15<sup>th</sup> Floor  
Chicago, Illinois 60606

Michael J. Huston  
Michael E. Allen  
Baker & Daniels  
300 North Meridian Street; Suite 2700  
Indianapolis, Indiana 46204

Pam Sherwood Vice President  
Regulatory Affairs, Midwest Division  
Time Warner Communications  
4625 W. 86<sup>th</sup> Street, Suite 500  
Indianapolis, Indiana 46268

John Kern  
2300 N. Barrington Road, Suite 400  
Hoffman Estates, IL 60195

Frank Darr  
National Regulatory Research Institute  
1080 Carmack Road  
Columbus, OH 43210

Jack R. Boheim  
President  
MTG Consulting  
P.O. Box 2448  
Mendocino, CA 95460

Nikki Gray Shoultz  
Sommer & Barnard, PC  
4000 Bank One Tower  
111 Monument Circle  
Indianapolis, Indiana 46204

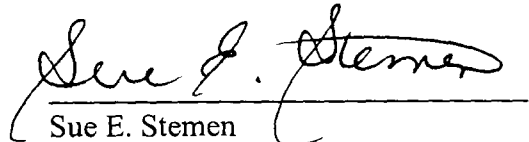
Charles R. Mercer, Jr.  
Sprint  
One North Capitol Ave., Suite 540  
Indianapolis, Indiana 46204

Robert K. Johnson  
Christopher C. Earle  
Bose McKinney & Evans  
2700 First Indiana Plaza  
135 North Pennsylvania Street  
Indianapolis, Indiana 46204

Ellyn Elise Crutcher  
Associate General Counsel  
McLeodUSA Telecommunications  
Services, Inc.  
121 South 17<sup>th</sup> Street  
Mattoon, IL 61920

Richard E. Aikman, Jr.  
Stewart & Irwin  
Two Market Center  
251 East Ohio Street, Suite 100  
Indianapolis, IN 46204

William Powers  
111 Monument Circle, Suite 302  
Indianapolis, IN 46204

  
Sue E. Stemen

## ATTACHMENTS

- '1 August 8, 2000 Plan of Record (POR)
- 2 September 20, 2000 POR Supplement
- 3 September 22, 2000 POR Supplement
- 4 September 22, 2000 FCC Letter re: POR
- 5 December 12, 2000 CMP (Change Management Process) as filed with  
the FCC
- 6 Interim GUI Terms
- 7 October 27, 2000 Accessible Letter CLEC AM 00-153 regarding  
FMOD
- 8 Hot Cuts Process
- 9 Revised Version of Account Management Handbook